

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 4/12/2016, 4/13/2016, 4/14/2016, 4/15/2016	Man Days: 6
Inspection Unit: PAWNEE	
Location of Audit: Pawnee	
Exit Meeting Contact: John Bozarth	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Charles Gribbins, Randy Stewart	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: (800) 755-5000 Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
John Bozarth	Manager, Gas Compliance and Training	(217) 625-6854
Robert Roth	Superintendent Quality Assurance, Gas Compliance & Training	(217) 778-0785

Gas System Operations	Status
Gas Transporter	Not Checked
<u>General Comment:</u> <i>Staff reviewed this information at the local operating centers.</i>	
Annual Report (Form 7100.1-1) reviewed for the year:	Not Checked
<u>General Comment:</u> <i>Staff reviewed the Annual Report at the ICC office in Springfield.</i>	
Unaccounted for Gas	Not Checked
<u>General Comment:</u>	

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Staff reviewed the Annual Report at the ICC office in Springfield.	
Number of Services	Not Checked
<u>General Comment:</u> Staff reviewed the Annual Report at the ICC office in Springfield.	
Miles of Main	Not Checked
<u>General Comment:</u> Staff reviewed the Annual Report at the ICC office in Springfield.	
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Not Checked
<u>General Comment:</u> Staff reviewed this information at the various Operating Centers.	
Operating Pressure (Feeder)	Not Checked
<u>General Comment:</u> Staff reviewed this information at the various Operating Centers.	
Operating Pressure (Town)	Not Checked
<u>General Comment:</u> Staff reviewed this information at the various Operating Centers.	
Operating Pressure (Other)	Not Checked
<u>General Comment:</u> Staff reviewed this information at the various Operating Centers.	
MAOP (Feeder)	Not Checked
<u>General Comment:</u> Staff reviewed this information at the various Operating Centers.	
MAOP (Town)	Not Checked
<u>General Comment:</u> Staff reviewed this information at the various Operating Centers.	
MAOP (Other)	Not Checked
<u>General Comment:</u> Staff reviewed this information at the various Operating Centers.	
Does the operator have any transmission pipelines?	Yes
Regulatory Reporting Records	Status

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[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed three incidents that were reported in 2014</i>		
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Satisfactory
<u>General Comment:</u> <i>All incidents were rescinded for 2014</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Applicable
<u>General Comment:</u> <i>No supplemental incident reports were deemed necessary at that time.</i>		
Did the operator have any plastic pipe failures in the past calendar year?		Yes
<u>General Comment:</u> <i>There were 8 plastic pipe failures reported in 2014 and other issues related to steel piping and regulators.</i>		
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		Yes
<u>General Comment:</u> <i>The operator mitigated safety concerns by sending the pe or components to GTI or GTC and relayed the findings to the area it was found in and the training center would address these situations with employees during training or follow-up training.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<u>General Comment:</u> <i>No safety related conditions</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<u>General Comment:</u> <i>No safety related conditions</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the information that was sent out to new customers within 90 days.</i>		
TEST REQUIREMENTS		Status

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<u>Category Comment:</u>		
Staff reviewed the pressure test records at the various Operating Centers for Ameren Illinois.		
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Not Checked
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Not Checked
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Not Checked
UPRATING		Status
<u>Category Comment:</u>		
Staff reviewed the Up-rating records at the various Operating Centers for Ameren Illinois.		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Checked
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Checked
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Satisfactory
<u>General Comment:</u>		
Staff reviewed the following documentation 2014 SMR Team Meeting Schedule Summary the review started in March and concluded in December of 2014. Also the following document was reviewed 2014 Subject Matter Reference Teams.		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Yes
<u>General Comment:</u>		
Staff reviewed documentation from 2014 SMR Team Meeting Schedule Summary these meetings occurred in October and November 2014.		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u>		
All this section is available to all operating personnel through the computer system in all company computers in the company vehicles.		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Satisfactory
<u>General Comment:</u>		
Staff reviewed QA program and noted that many changes were made to the program.		
CONTINUING SURVEILLANCE RECORDS		Status

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<u>Category Comment:</u>		
<i>The Operators system does not contain any cast iron pipes.</i>		
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Satisfactory
<u>General Comment:</u>		
<i>Staff reviewed the following documents: Ameren Illinois System Review, 2013 System Review Form HCA_Diff_Table, and Ameren Illinois Memorandum Letter. Annual Odorant Intensity Test Point Review, Corrosion Control.</i>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
DAMAGE PREVENTION RECORDS		Status
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Satisfactory
<u>General Comment:</u>		
<i>Staff reviewed computer records for locate request for 2014 records.</i>		
Has the number of damages increased or decreased from prior year?		Damage ratios have been going down.
<u>General Comment:</u>		
<i>Damage ratio is going down.</i>		
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Satisfactory
<u>General Comment:</u>		
<i>Satisfactory This information is logged in to two different system on the computer and can be cross reference if information is needed.</i>		

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[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Satisfactory
<u>General Comment:</u> <i>Irthnet company documentation and this information can be shared between all individuals that need this information.</i>		
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Yes
<u>General Comment:</u> <i>Yes they have a quality Assurance Program.</i>		
Do pipeline operators include performance measures in facility locating contracts?		Yes
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Satisfactory
<u>General Comment:</u> <i>Staff reviewed documentation on the computer system.</i>		
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		Yes
Were Common Ground Alliance Best Practices discussed with the Operator?		Not Applicable
<u>General Comment:</u> <i>Ameren personnel advised that they met or exceed the Common Ground Alliance Best Practices.</i>		
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>EMER 2.04 of the operator's O&M contains the emergency plan.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the following record CRSE 467- Annual Emergency Plan/Security Plan Review</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the following documentation: Emergency Response Review, this document is filled out to determine whether the procedures were followed by</i>		

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<i>operator employees during emergency situations.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Satisfactory
<u>General Comment:</u> <i>The operator was able to provide documentation of all liaison meetings for 2014, including sign in sheets showing the department represented and person(s) attending the meeting.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the following document, 2014 – Delayed Gas Leak Response Time, there are 35 response times that exceeded the 60 minute time intervals. Most times exceeded were due to severe weather conditions where multiple company employees were called to respond to the complaints.</i>		
ODORIZATION OF GAS		Status
<u>Category Comment:</u> <i>Odorization records were reviewed in the different operating areas.</i>		
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Not Checked
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Not Checked
[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Not Checked
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Not Checked
PATROLLING & LEAKAGE SURVEY		Status
<u>Category Comment:</u> <i>Staff reviewed patrolling and leak survey records in the different Operating Centers.</i>		
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Not Checked
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Not Checked
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Not Checked
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3	Not Checked

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	years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	
YARD LINES - RESIDENTIAL		Status
<u>Category Comment:</u> <i>Staff reviewed yard line leak survey records and cathodic protection records in the different Operating Centers.</i>		
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Not Checked
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Not Checked
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Not Checked
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
<u>Category Comment:</u> <i>Staff reviewed abandonment and or deactivation of facilities records in the different Operating Centers.</i>		
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Not Checked
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Checked
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Not Checked
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Not Checked
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Checked
PRESSURE LIMITING AND REGULATION		Status
<u>Category Comment:</u> <i>Staff reviewed pressure limiting and regulation records in the different Operating Centers.</i>		
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting	Not Checked

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	and regulating stations at a minimum of 1 per year/15 months?	
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Not Checked
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Not Checked
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	Not Checked
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Not Checked
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Not Checked
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Checked
VALVE MAINTENANCE		Status
<u>Category Comment:</u> <i>Staff reviewed valve inspection and maintance records in the different Operating Centers.</i>		
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Not Checked
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Checked
Investigation Of Failures		Status
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable
<u>General Comment:</u> <i>The operator did not have any failures that were required to be analyzed for 2014.</i>		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Satisfactory
<u>General Comment:</u> <i>Welding procedures were reviewed and are included in the O&M Manual. No issues were noted.</i>		

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[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification as required?	Satisfactory
<u>General Comment:</u> <i>Reviewed 2014 welding qualifications/re-qualification, no issues were identified.</i>		
[192.807]	Does the operator have documentation of welder OQ records?	Satisfactory
<u>General Comment:</u> <i>Welder OQ records were reviewed, no issues were noted.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Satisfactory
<u>General Comment:</u> <i>NDT qualifications were reviewed for JANX, and McDNT. The NDT records were reviewed at a previous audit at Decatur Plaza.</i>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
<u>General Comment:</u> <i>NDT records are maintained in the construction packets at Decatur Plaza or in the storage fields.</i>		
JOINING OF MATERIAL OTHER THAN WELDING		Status
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Satisfactory
<u>General Comment:</u> <i>2104 fusion qualification records were reviewed for Ameren employees and contract employees from K&s, Intercon, Infrasource, and Local 137.</i>		
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Satisfactory
<u>General Comment:</u> <i>The fuser is qualified during the qualification process for inspection. Construction Inspectors are also qualified and as a third layer the QA team members are also qualified to inspect joining.</i>		
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Satisfactory
<u>General Comment:</u> <i>PE joining procedures were reviewed, no issues were noted. The joining procedures are located in section "POLY - Polyethylene Pipe" of the operator's O&M.</i>		
CORROSION CONTROL RECORDS		Status
<u>Category Comment:</u> <i>Staff reviewed records of cathodically protected piping, facilities, bonds, rectifiers and all records associated with cathodic protection at the different local Operating Centers.</i>		
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	Not Checked

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[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Not Checked
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Not Checked
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Not Checked
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Checked
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Checked
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Checked
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Not Checked
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Not Checked
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Checked
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Not Checked
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Checked
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Not Checked
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Checked
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Not Checked
[192.491][192.479]	Has the operator maintained documentation of corrective	Not Checked

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	action where atmospheric corrosion was discovered?	
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Checked
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<u>General Comment:</u> O&M reviews to correspond with 2 updates to the O&M (Jan and April) Apprenticeship program. Mock emergency scenarios Leak investigation review 6 week program for new welders		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Satisfactory
<u>General Comment:</u> The operator has a 27-36 month Apprenticeship program, depending upon the legacy company.		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u> Ameren is a public utility, not a municipal operator and as such this section does not apply.		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<u>General Comment:</u> The operator releases periodic "Action Matters" newsletters as a reminder for correct O&M procedures or to address issues that have arisen in the field.		

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